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IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT
MONTGOMERY, ALABAMA

AUG 10 P 1:35
DEBRA P. HACKETT, CLK
U.S. DISTRICT COURT
MIDDLE DISTRICT ALA

LORENZO PEARSON
PLAINTIFF

VS

1:17cv522

SECURITY FINANCE CORPORATION OF ALABAMA, INC, SECURITY FINANCE CORPORATION OF SPARTANBURG, SPARTAMBURG, SOUTH CAROLINA; SECURITY FINANCE OF OZARK ALABAMA, SECURITY FINANCE OF DOTHAN ALABAMA and FICTITIOUS PARTIES TO BE INCLUDED AFTER DISCOVERY DEFENDANTS

Motion To Amend Freely Or With Leave Pursuant FRCP 15(a)1

First Amended Pleadings Incorporated As General Statement Pleadings As to All Other Pleadings And Cause of Action(s)

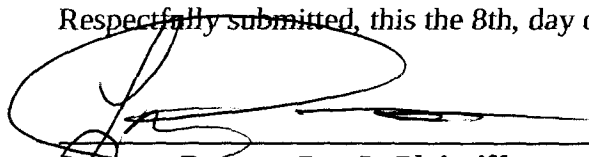
1. Plaintiff submit **Exhibit A** first "claimed" adverse action letter sent out on August 26, 2016, **Exhibit B** second "claimed" adverse action letter sent out on November 2, 2016, and **Exhibit C** pg. 1 and 2 letter from Defendant(s) to the Court as evidence the Defendant(s) claim they used Equifax Credit Bureau results to determine as a part of or wholly that Plaintiff was denied Credit.
2. Plaintiff agree that discovery can determine that an Equifax Credit report was acquired on the date the Defendant(s) "claim" they sent out the adverse action letters.
3. Exhibit C written by the Defendant(s) show Plaintiff applied and was denied credit based on Equifax Credit Report. Further, I side with if the Defendant(s) submit this as what they claim to have sent on the dates given it will be proven as fraud on the court.
4. The Plaintiff at the same time "deny" the claimed "adverse action letters" were ever given to him in any form until the date of the "letter" Exhibit C that was included with Exhibit A and B.
5. Therefore the Defendants violated the statue of the Fair Credit Reporting Act Pursuant Section 615(a) 15 U.S.C. § 1681m(a). and it is yet to be determined if they were genuinely produced on the dates they claimed or not. For sure they was not sent to the Plaintiff on any date prior to these letters.
6. Plaintiff incorporate these pleadings as set out in full as to all pleadings previously submitted in this case and whereforas, request the same judgments and demand for jury trial as to all issues.
7. ~~I do not intend to disregard or abandoned my previous pleadings and reserve the right to amend until discovery is closed or otherwise Court order.~~


Lorenzo Pearson Plaintiff Pro Se

CERTIFICATE OF SERVICE

Plaintiff certifies that he has mailed a copy by U.S. mail of the above style complaint prepaid to defendant(s) main office at their perspective address noted in the paragraph parties above, this the 8th, day of August, 2017.

Respectfully submitted, this the 8th, day of August, 2017.



Lorenzo Pearson Pro Se Plaintiff
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MONTGOMERY AL 360

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United States District Court
Middle District of Alabama
One Church St.
Montgomery AL 36104

36104-401801

